

Before the
Federal Communications Commission
Washington, DC 20554

In the Matter of

)
Amendment of Parts 2 and 97 of) ET Docket No. 02-98
the Commission's Rules to) RM-9404
Create a Low Frequency)
Allocation for the Amateur Radio)
Service)
)
Amendment of Parts 2 and 97 of)
the Commission's Rules) RM-10209
Regarding an Allocation of a)
Band Near 5 MHz for the)
Amateur Radio Service)
)
Amendment of Parts 2 and 97 of)
the Commission's Rules) RM-9949
Concerning the Use of the 2400)
-2402 MHz Band by the Amateur)
and Amateur-Satellite Services)

COMMENTS OF MICHAEL BUCKLAEW, KA2KQP

I would like to comment on each point of the proposal as follows:

In regards to the proposed low frequency allocation (135.7-137.8 kHz), I agree that such an allocation would be in the public interest because amateur experimentation could lead to a better understanding of communication techniques in this frequency range. The proposed power and bandwidth limits seem to be adequate for this experimentation. Because of the difficulty some amateurs may have in calculating EIRP or even measuring transmitter output power until such time as calibrated power meters become available at reasonable cost, the Commission may choose to use a DC input power rating as an alternative.

In regards to the proposed secondary allocation near 5 MHz I agree that this would greatly benefit the public interest by providing frequencies where propagation should be more favorable when 3.5 MHz and 7.0 MHz are not. I believe that General class licensees and above should be allowed access to this band. Because of the proposed secondary status and our requirement to not cause interference to the primary users of the band, I believe that mode sub-banding in such a narrow band would limit the amateurs ability to change frequency to avoid interference while still carrying on what may be vital communications. I do not know what power level the primary users of the band generally operate at. We as secondary users of the band should not be allowed

to use more power than the primary users do. If the primary users abandon their allocation, sub-banding and increased power limits would be more appropriately addressed at that time. An idea to help reduce interference not just in this allocation, would be to have sample recordings of primary user's transmissions available so that an amateur would know what to listen for. It is easy to recognize transmissions such as CW, RTTY, and or AM/SSB voice transmissions but other emission types may not be as familiar to amateur operators.

In regards to the upgrade of the amateur and amateur satellite allocation of 2400 - 2402 MHz, I agree that this will help protect the existing and planned amateur satellite(s), which are expensive and long lead-time projects, from interference from incompatible users of the this segment.

Respectfully submitted by,

Michael J Bucklaew
Amateur Radio Operator KA2KQP